John J. Sullivan Kipp C. Leland HILL RIVKINS & HAYDEN LLP Attorneys for Plaintiffs 45 Broadway, Suite 1500 New York, New York 10006 (212) 669-0600

## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

PLEASE TAKE NOTE that the plaintiffs by their attorneys, Hill Rivkins & Hayden LLP, hereby request that the Clerk enter the default of defendant, Stanislav Filatov, who has failed to answer the Complaint or otherwise appear in this action, and whose time in which to appear and defend in this action has expired.

Dated: September 10, 2007 New York, New York

Respectfully Submitted,

HILL RIVKINS & HAYDEN LLP Attorneys for Plaintiffs

Bv·

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